

The implementation of BPL should be done in coordinated cooperation with licensed services within the proposed area of operation. A repository of information, whether it reside in an industry maintained database or a federal database should be maintained which at the very minimum contains GIS portrayal of proposed or actual area of operation, proposed or actual range of frequencies of operation, as well as a staffed 24 hr/ 7 day central point of contact, such as a network operations center, who is familiar with the BPL system and has the authority to conduct interference amelioration to licensed services. Whenever interference is detected, the BPL provider should immediately implement measures to remedy the situation. A BPL system should be disabled whenever the Commission declares a communications emergency within its region. Likewise, a BPL system which falls within a station serving a disaster area should be disabled when a communications emergency is declared.

The Commission, in its request for comments, sees a great economic windfall for "small" businesses and communities in disadvantaged regions. In reality, many small communities, volunteer fire departments and highway patrols in disadvantaged areas depend upon VHF low band (30 - 50 MHz) for their communications systems. The implementation of BPL forces a mandate on these communities and agencies to either suffer disruption and scrap their radio systems, or hire more knowledgeable people, which they cannot afford, to mitigate their interference problems caused by BPL providers. Funding sources, or damages for systems impaired by BPL interference should be provided by BPL carriers when required so that emergency services who are suffering impairment may move to other spectrum.

Access BPL will ride along the entire power grid. In other broadband models such as DSL, a non-subscriber does not receive DSL through their telephone system emburdening them to place filtering on each line. BPL providers should supply filtering devices at each power line to a non-subscriber to lessen the event of interference.